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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

INTERNATIONAL FIDELITY INSURANCE)
COMPANY, a New Jersey corporation, and)
ALLEGHENY CASUALTY COMPANY, a)
New Jersey corporation,)
Plaintiffs,)
v.)
FRED ADKERSON, INC., an Alaska)
corporation, d/b/a FRED'S BAIL BONDING,)
and FRED PARKER ADKERSON,) Case No. 3:20-cv-00247-TMB
Defendants.)

)

**PLAINTIFFS' COMPLAINT (APPLICATION) FOR
TEMPORARY RESTRAINING ORDER AND FURTHER INJUNCTIVE RELIEF**

Plaintiffs, International Fidelity Insurance Company (International) and Allegheny Casualty Company (Allegheny) through their attorneys, Brena, Bell & Walker, P.C., and pursuant to Federal Civil Rule 65, respectfully request that this Court immediately issue a temporary restraining order (TRO) against Defendant Fred Parker Adkerson (Adkerson),

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Complaint for TRO and Further Injunctive Relief
International Fidelity and Allegheny Casualty vs. Fred Adkerson, Inc.

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owner of Fred Adkerson, Inc., d/b/a Fred's Bail Bonding (Fred's) to prevent Adkerson from withdrawing any funds from the client collateral account entitled: "Fred P. Adkerson in trust for International Fidelity Insurance Company" (collateral account).¹ Plaintiffs have approximately \$900,000.00 at risk if Adkerson continues to improperly withdraw funds from the collateral account.

Plaintiffs further request that the Court set a hearing for the accompanying complaint for preliminary injunction to require Adkerson to turn over the collateral account to Plaintiffs as contractually required. Plaintiffs similarly have approximately \$900,000.00 at risk if Adkerson continues to refuse to tender control of the collateral account.

This Complaint (Application) is accompanied by the Motion and Memorandum in support thereof, as well as the attached Proposed Order. Plaintiffs are serving Defendants with these documents.

DATED this 1st day of October, 2020.

BRENA, BELL & WALKER, P.C.
Attorneys for Plaintiffs

By _____


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¹ Exhibit C at 1, attached to the Memorandum in Support of Complaint (Application) for Temporary Restraining Order and Further Injunctive Relief filed herewith.